

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

WILBER ENSLEY,  
COVEY ANDREWS,  
SHAMAR ARCHER,  
DEUNTE HUMPHRIES, and  
JAMAR GILLIAM,

Plaintiffs,

Case: 3:17-cv-00024-MHL

v.

CITY OF RICHMOND, VIRGINIA,  
JASON NORTON,  
BRYAN T. NORWOOD,  
CHRISTOPHER GLEASON,  
CHARLES SIPPLE,  
ROGER RUSSELL,  
MICHAEL ALSTON,  
BRIAN CORRIGAN,  
MARTIN HARRISON, and  
WILLIAM BLACKWELL,

Defendants.

**PLAINTIFFS' MOTION FOR EXTENSION**

COME NOW Plaintiffs Wilber Ensley, Covey Andrews, Shamar Archer, Deunte Humphries, and Jamar Gilliam, by counsel, and for their Motion for Extension, state as follows:

1. This matter was filed on January 13, 2017. (ECF No. 1).
2. Thereafter, the Complaint and summons were served on Defendants. Defendants Norton, Norwood, Gleason, Corrigan, Harrison, and Blackwell were served on January 17, 2017; Defendants City of Richmond, Russell, and Alston were served on January 18, 2017; and Defendant Sipple was served on January 27, 2017 (ECF Nos. 6, 7, 14). Given the number of Defendants and the breadth of the issues and claims involved, all Defendants asked for and were

granted, with Plaintiffs' agreement, a two-week extension to file responsive pleadings from the date of service of the last of them to be served, Mr. Sipple.

2. All Defendants filed Motions to Dismiss and memoranda in support thereof timely on March 3, 2017 (ECF Nos. 22-31).

3. Due to the number of Motions to Dismiss and the extensiveness of the relevant arguments and issues, as well as to the nature of their claims, which involve violations of the United States Constitution against multiple parties, Plaintiffs respectfully request that they be granted an extension of three (3) weeks from the date when their oppositions would normally be due. This amounts to an extension until April 7, 2017.

4. All defense counsel were consulted concerning Plaintiff's instant Motion, and they had no objection to the request.

WHEREFORE, for the reasons expressed herein, Plaintiffs, by counsel, respectfully request that the Court grant them an extension until April 7, 2017 to file their oppositions to Defendants' Motions to Dismiss.

WILBUR ENSLEY,  
COVEY ANDREWS,  
SHAMAR ARCHER,  
DEUNTE HUMPHRIES and  
JAMAR GILLIAM

By: /s/ Mark J. Krudys

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Counsel

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*Counsel for Plaintiffs Wilbur Ensley, Covey Andrews, Shamar Archer, Deunte Humphries, and Jamar Gilliam*

**CERTIFICATE OF SERVICE**

I certify that on March 10, 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all registered users.

By: /s/ Mark J. Krudys \_\_\_\_\_

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